

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Baltimore)**

MARLONN HILL, ET AL.,)	
)	
Plaintiff,)	
)	
v.)	Case No.
)	
WESTMINSTER MANAGEMENT, LLC, ET AL.)	
)	
Defendant.)	

**NOTICE OF REMOVAL OF ACTION UNDER 28 U.S.C. § 1441(b)
(FEDERAL QUESTION)**

PLEASE TAKE NOTICE that Defendants Westminster Management, LLC and Morningside Park Holdings, LLC¹ (collectively “Defendants”) hereby remove to this Court the state court action described below.

1. On or about April 20, 2015, Plaintiffs, Marlonn Hill and Michael W. Hill, Sr., commenced an action in the Circuit Court for Baltimore County, Maryland, entitled *Malonn Hill, et al. v. Westminster Management, LLC, et al.*, bearing Case Number 03-C-15-004309. A copy of the summons and complaint received by Defendants is attached and marked as Exhibit A in accordance with L.R. 103.5a).

2. This action is a civil action of which this Honorable Court has original jurisdiction under 28 U.S.C. § 1331, and is one which may be removed to this Court by Defendants pursuant to 28 U.S.C. § 1441(c) in that it presents a federal question, in that Plaintiffs allege violations of 15 U.S.C. § 1692 *et seq.*, the Fair Debt Collection Practices Act (“FDCPA”).

¹ The third named Defendant Westminster/Morningside Park is not a legal entity.

3. This Court also has supplemental jurisdiction over the State law claims pursuant to 28 U.S.C. § 1367.

4. Defendants were served on May 27, 2015. This removal is timely pursuant to 28 U.S.C. § 1446(b).

4. To the best of the undersigned's knowledge, no other pleadings or documents, other than the summons and complaint attached hereto, have been filed in this matter.

5. As required by 28 U.S.C. § 1446(d), Defendants will give notice of the filing of this notice to the Plaintiff and to the clerk of the Circuit Court for Baltimore County, Maryland, where the action is currently pending.

WHEREFORE, Defendant respectfully requests that the above captioned matter currently pending in the Circuit Court for Baltimore County, Maryland be removed to this Honorable Court.

THE LAW OFFICES OF RONALD S. CANTER, LLC



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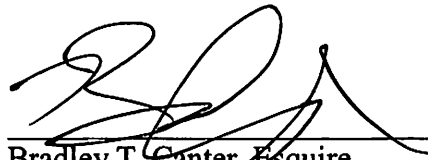
E-Mail: bcanter@roncanterllc.com

*Attorney for Defendants Westminster Management, LLC
and Morningside Park Holdings, LLC*

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing Notice of Removal and related documents was served this 25th day of June, 2014, by first class mail, postage prepaid to:

Deborah Halloway Hill, Esq.
32 Acorn Circle, #301
Towson, Maryland 21286
Attorney for Plaintiffs

A handwritten signature in black ink, appearing to read 'B. Canter', is written over a horizontal line.

Bradley T. Canter, Esquire
*Attorney for Defendants Westminster Management, LLC
and Morningside Park Holdings, LLC*